

Message

**From:** Laumann, Sara [Laumann.Sara@epa.gov]  
**Sent:** 8/5/2019 7:53:31 PM  
**To:** Clark, Adam [Clark.Adam@epa.gov]; Wallace, Larry [Wallace.Larry@epa.gov]; Tillerson, Clint [Tillerson.Clint@epa.gov]; Carrillo, Andrea [Carrillo.Andrea@epa.gov]  
**Subject:** RE: ND Ongoing Verification Report  
**Attachments:** Otter\_Tail-AR2018.pdf

In case this is of interest, see first paragraph on page 22 of Ottertail's most annual stockholder report, which indicates the company submitted an analysis to the state regarding the technical feasibility of controls for SO<sub>2</sub> (and NO<sub>x</sub>).

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-----Original Appointment-----

**From:** Clark, Adam <Clark.Adam@epa.gov>  
**Sent:** Monday, August 5, 2019 9:41 AM  
**To:** Clark, Adam; Wallace, Larry; Tillerson, Clint; Carrillo, Andrea; Laumann, Sara  
**Subject:** ND Ongoing Verification Report  
**When:** Monday, August 5, 2019 2:00 PM-2:30 PM (UTC-07:00) Mountain Time (US & Canada).  
**Where:** Conf. Line: 202-991-0477 ; Code: Ex. 6 Personal Privacy (PP)

Hi All – I have some specific questions in light of a North Dakota ongoing verification report that's currently out for public comment (attached).

The main issue in the report is Coyote. As you all know, in the DRR we recommended that the air agency conduct additional modeling for areas originally modeled between 50 percent and 90 percent of the standard and emissions in the area increased by 15 percent or more. Coyote was modeled by itself using actual emissions from 2012-2014 for SO<sub>2</sub> designations round 2 (area called "Central Mercer County"), so ND submitted its report addressing 15-17 last year. For this report, ND compares the average of the 12-14 emissions with the 2018 emissions. The table below shows the emissions and the percentage change between the modeled years (12-14) and 2018, which was their highest emissions year since before 2012.

Source Name	Emission Years modeled	2012	2013	2014	2015	2016	2017	2018	Modeled 4th Max (µg/m3)
Coyote	2012-2014	10639	12579	12777	8786	11872	13443	14913	115.88
12-14 Average	11998							% of SO <sub>2</sub> NAAQS	59%
12-14 Max (14)	12777								
18 vs Average (increase)	19.54%								
18 vs Max (increase)	14.32%								

## Ex. 5 Deliberative Process (DP)

# **Ex. 5 Deliberative Process (DP)**

Here are some questions I'd like to address in this meeting;

# **Ex. 5 Deliberative Process (DP)**